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Attorneys for Plaintiff
 LORI WADE

UNITED STATES DISTRICT COURT FOR THE
 NORTHERN DISTRICT OF CALIFORNIA

LORI WADE, individually and as Personal Representative of PAUL ALAN WADE Deceased,)	No. CV 09 1976 JCS
)	
)	E-filing
)	
Plaintiff,)	
)	STIPULATION AND PROPOSED
vs.)	ORDER CONTINUING INITIAL
)	CASE MANAGEMENT CONFERENCE
)	AND RELATED DEADLINES
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

COME NOW THE PARTIES HERETO, by and through their respective counsel, and hereby stipulate as follows, that:

Stipulation and ~~Proposed~~ Order Continuing
 Initial Case Management Conference and
 Related Deadlines

McGuinn, Hillsman & Palefsky
 535 Pacific Avenue
 San Francisco, CA 94133
 415/421-9292

WHEREAS, Defendant UNITED STATES OF AMERICA appeared herein on July 10, 2009; and,

WHEREAS, counsel for the parties met and conferred in person on Monday, July 21, 2009, to discuss initial disclosures and ADR planning, in compliance with the Court's May 5, 2009 Order Setting Initial Case Management Conference and ADR deadlines;

The following continuances are respectfully requested in order to give the parties adequate time to prepare for the Initial Case Management Conference and to file and exchange the required documents prior to said Conference:

Currently Scheduled Date	Proposed Continued Date
Initial Case Management Conference August 14, 2009, 1:30 p.m.	September 18, 2009, 1:30 p.m.
filing of Joint Case Management Statement August 7, 2009	September 11, 2009
filing of Rule 26(f) Report August 7, 2009	September 11, 2009
exchange of Initial Disclosures August 7, 2009	September 11, 2009
filing of ADR Certification and either Stipulation to ADR Process or Notice of Need for ADR Phone Conference July 24, 2009	September 11, 2009

IT IS SO STIPULATED:

Stipulation and Proposed Order Continuing
Initial Case Management Conference and
Related Deadlines

1 Dated: June 21, 2009

McGUINN, HILLSMAN & PALEFSKY
Attorneys for Plaintiff

4 By: /s/ Derek B. Jacobson

5 _____
Derek B. Jacobson

6 Dated: _____

TONY WEST
Assistant Attorney General
JOSEPH P. RUSSONIELLO
United States Attorney
R.MICHAEL UNDERHILL
Attorney in Charge, West Coast Office
Torts Branch, Civil Division

11 By: /s/ Jean M. Franken

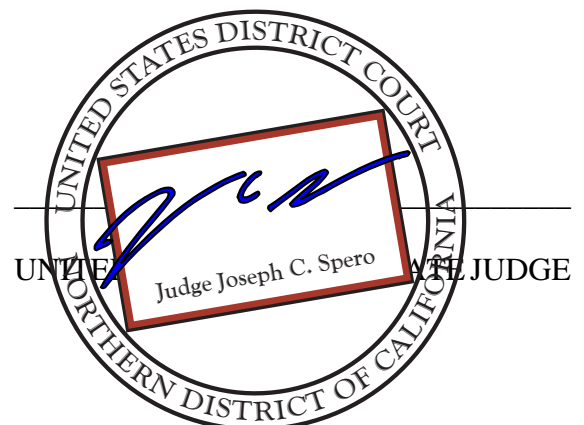
12 _____
Jean M. Franken
Trial Attorney
Torts Branch, Civil Division
U.S. Department of Justice

16 **ORDER CONTINUING INITIAL CASE MANAGEMENT CONFERENCE
AND RELATED DEADLINES**

18 GOOD CAUSE APPEARING THEREFOR, the Initial Case Management Conference
19 scheduled for August 14, 2009, is hereby continued to the new date of Friday, September 18,
20 2009, at 1:30 p.m., and the Court hereby adopts the rescheduled deadlines set forth above.

21 IT IS SO ORDERED.

24 Dated: July 31, 2009



28 _____
Stipulation and Proposed Order Continuing
Initial Case Management Conference and
Related Deadlines